UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

LORY FABIAN)	
Plaintiff,)	
vs.)	Cause No: 4:12-cv-01112-JAR
THE ST. LOUIS RAMS PARTNERSHIP, et al. Defendant.)))	
)	

MOTION TO COMPEL

COME NOW Plaintiff, by and through counsel, and moves the Court for a Motion to Compel and states as follows:

- 1. On August 15, 2013, Plaintiff submitted her Second Request for Production of Documents to the Defendant St. Louis Rams. (See Exhibit A)
- 2. Pursuant to Local Rule and this Court's requirements, Movant's counsel has sent correspondence to opposing counsel Brad Winters outlining specifically what discovery requests need to be further responded to or what objections need to be worked out. (See Exhibit B).
- 3. As of September 16, 2013 Defendants have not served any response to Plaintiff's Second Request for Production of Documents.
- 4. Plaintiff submits to the Court that Defendants should be compelled to respond in full to Plaintiff's Second Request for Production of Documents.

WHEREFORE, Plaintiff, Lory Fabian requests the Court to grant this Motion to Compel and compel the Defendant St. Louis Rams to fully respond to Plaintiff's Second Request for Production of Documents referenced above and for such other and further relief as the Court deems just and proper including granting Plaintiff's attorney's fees and costs incurred.

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A copy of the foregoing document has been sent the via the electronic court system of the United States Federal Court this 16th day of September, 2013 to:

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/s/ Edward C. Kruse____